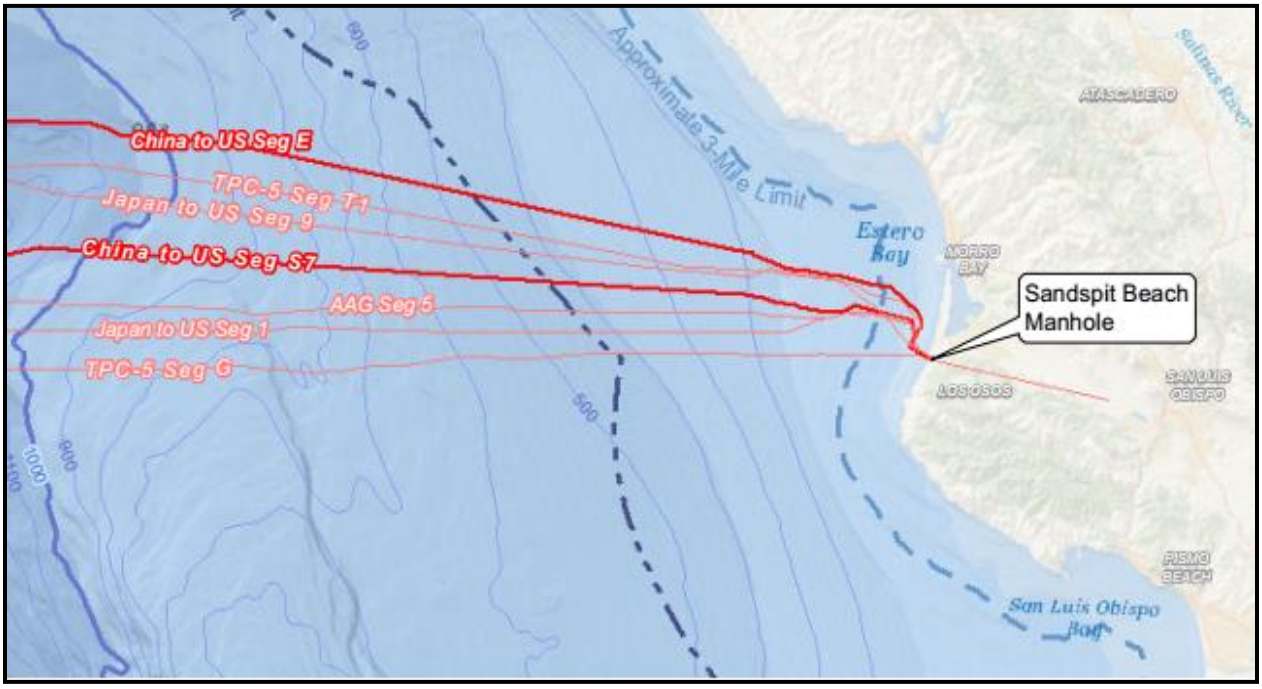
State Clearinghouse No. 99051063
CSLC EIR No. 698



ADDENDUM TO ENVIRONMENTAL IMPACT REPORT

AT&T CHINA-U.S. CABLE NETWORK, SEGMENTS E1 AND S7 PROJECT

OFFSHORE OF MORRO BAY
SAN LUIS OBISPO COUNTY, CALIFORNIA

CEQA Lead Agency:
California State Lands Commission
100 Howe Avenue, Suite 100 South
Sacramento, CA 95825

Established in 1938

November 2017

MISSION STATEMENT

The California State Lands Commission provides the people of California with effective stewardship of the lands, waterways, and resources entrusted to its care through preservation, restoration, enhancement, responsible economic development, and the promotion of public access.

CEQA DOCUMENT WEBSITE
www.slc.ca.gov/Info/CEQA.html

Project Geographic Location*

	Latitude	Longitude
PRC 8154.1	35.33471	-120.92897
PRC 8278.1	35.33653	-120.89669

* Point data provided from California State Lands Commission internal GIS lease database. Coordinates in decimal degrees.

Project Proponent:
AT&T
c/o Paul Hastings LLC
101 California Street, 48th Floor
San Francisco, CA 94111

Document prepared in coordination with:

padre associates, inc.
ENGINEERS, GEOLOGISTS & ENVIRONMENTAL SCIENTISTS

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LIST OF ABBREVIATIONS AND ACRONYMS

A	AB	Assembly Bill
	APCD	San Luis Obispo (SLO) County Air Pollution Control District
	APM	Applicant Proposed Measure
C	CARB	California Air Resources Board
	CDFW	California Department of Fish and Wildlife
	CEQ	Council of Environmental Quality
	CEQA	California Environmental Quality Act
	cfm	Cubic feet per minute
	CFR	Code of Federal Regulations
	CH_4	Methane
	CO	Carbon monoxide
	CO_2	Carbon dioxide
	CO_2e	Carbon dioxide equivalents
	CSLC	California State Lands Commission
D	DPM	Diesel Particulate Matter
E	EIR	Environmental Impact Report
	ESA	Environmental Site Assessment
G	GHG	Greenhouse Gas
	GWP	Global Warming Potential
H	HFCs	Hydrofluorocarbons
	hp	Horsepower
K	kW	Kilowatt
L	lbs.	Pounds
M	MISA	Marine Invasive Species Act

	MISP	Marine Invasive Species Program
	MM	Mitigation Measure
	MMPA	Marine Mammal Protection Act
	MPA	Marine Protected Area
	MSAP	Marine Safety and Anchoring Plan
	$MTCO_2e$	Metric tons of carbon dioxide equivalent
	M/V	Marine Vessel
N	N_2O	Nitrous oxide
	NAS	Non-native aquatic species
	NO_x	Nitrogen oxides
	NO_2	Nitrogen dioxide
O	OSCRP	Oil Spill Contingency and Response Plan
P	PM_{10}	Particulate matter less than 10 micrometers
	$PM_{2.5}$	Particulate matter less than 2.5 micrometers
R	ROG	Reactive Organic Gases
	ROV	Remote Operated Vehicle
S	SB	Senate Bill
	SF_6	Sulfur hexafluoride
	SLO	San Luis Obispo
	SO_2	Sulfur dioxide
U	U.S.	United States
	USCG	U.S. Coast Guard
	USEPA	U.S. Environmental Protection Agency
	USFWS	U.S. Fish and Wildlife Service

1.0 INTRODUCTION

1.1 PROJECT LOCATION AND BACKGROUND

In April 2000, the California State Lands Commission (Commission or CSLC), as lead agency under the California Environmental Quality Act (CEQA), certified a Final Environmental Impact Report (EIR) for the AT&T China–U.S. Cable Network, Segments E1 and S7 Project (2000 Project) (Item 13, April 20, 2000).[1] The Commission also authorized two leases to AT&T Corp and its partners (AT&T) for the 2000 Project, which included the installation of two new fiber optic cable segments on the seafloor off Morro Bay, San Luis Obispo County (Figure 1-1): (1) Lease No. PRC 8278.1, China–U.S. Cable Segment E1; and (2) Lease No. PRC 8154.1, China-U.S. Cable Segment S7. The E1 and S7 cable segments were designed to complete the China–U.S. Cable Network "ring." Original Project activities in the offshore, nearshore, and onshore areas included (see Appendix B for a copy of the Project installation as-built drawings):

1) Lay the 66.9-mile-long Segment E1 and 58.5-mile-long Segment S7, from an existing subsea bore hole and along the seafloor to an approximate 6,000-foot (1,000-fathom) water depth, a distance of 57± miles offshore

2) Pull the cables through an existing conduit system below the beach to a manhole located in the Sandspit parking lot at Montaña de Oro State Park (Figure 1-2)

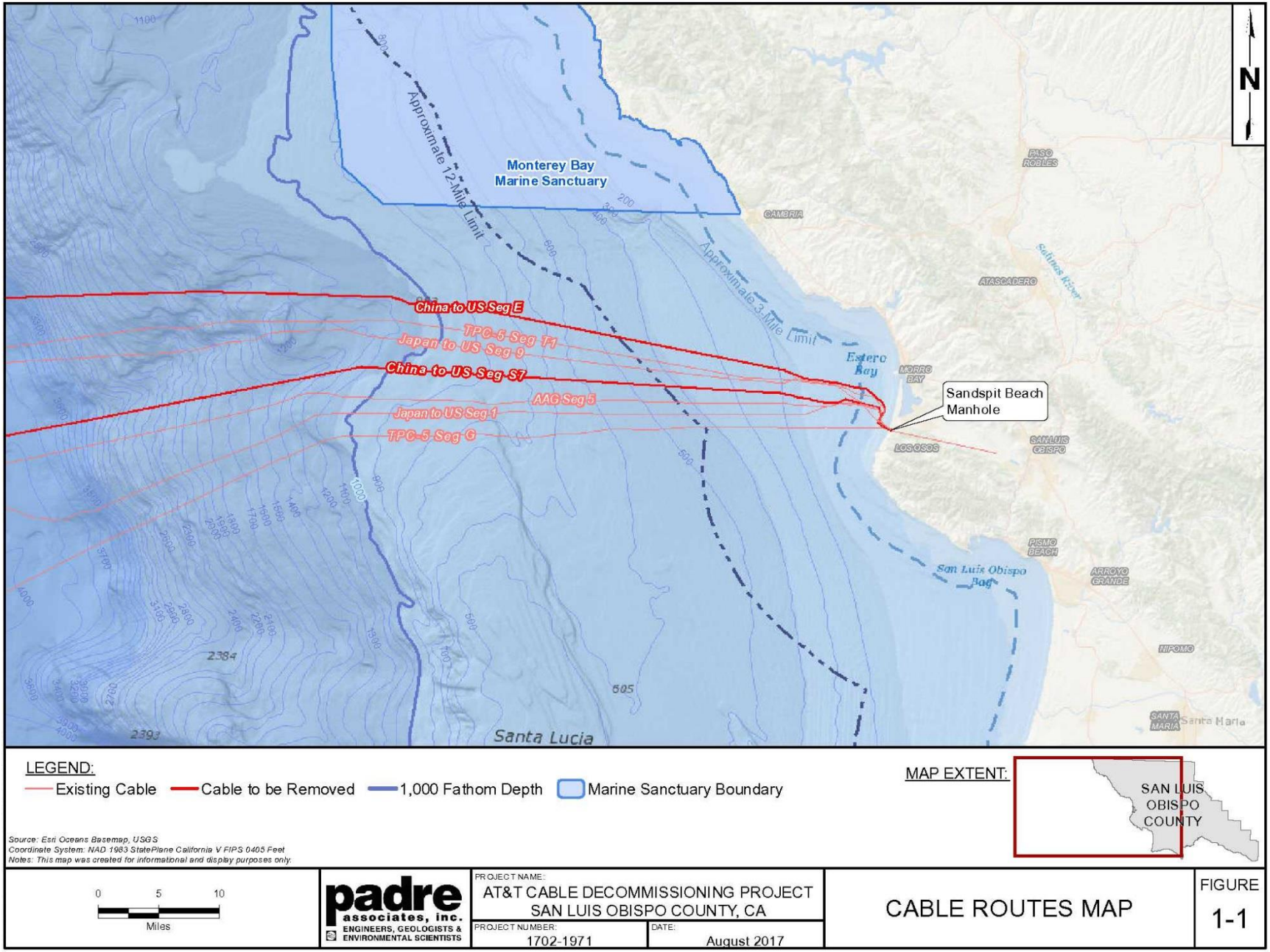
3) Splice the cables into an existing cable system within an existing cable conduit to connect the cables into the greater system at an existing AT&T terminal building located approximately 10 miles east

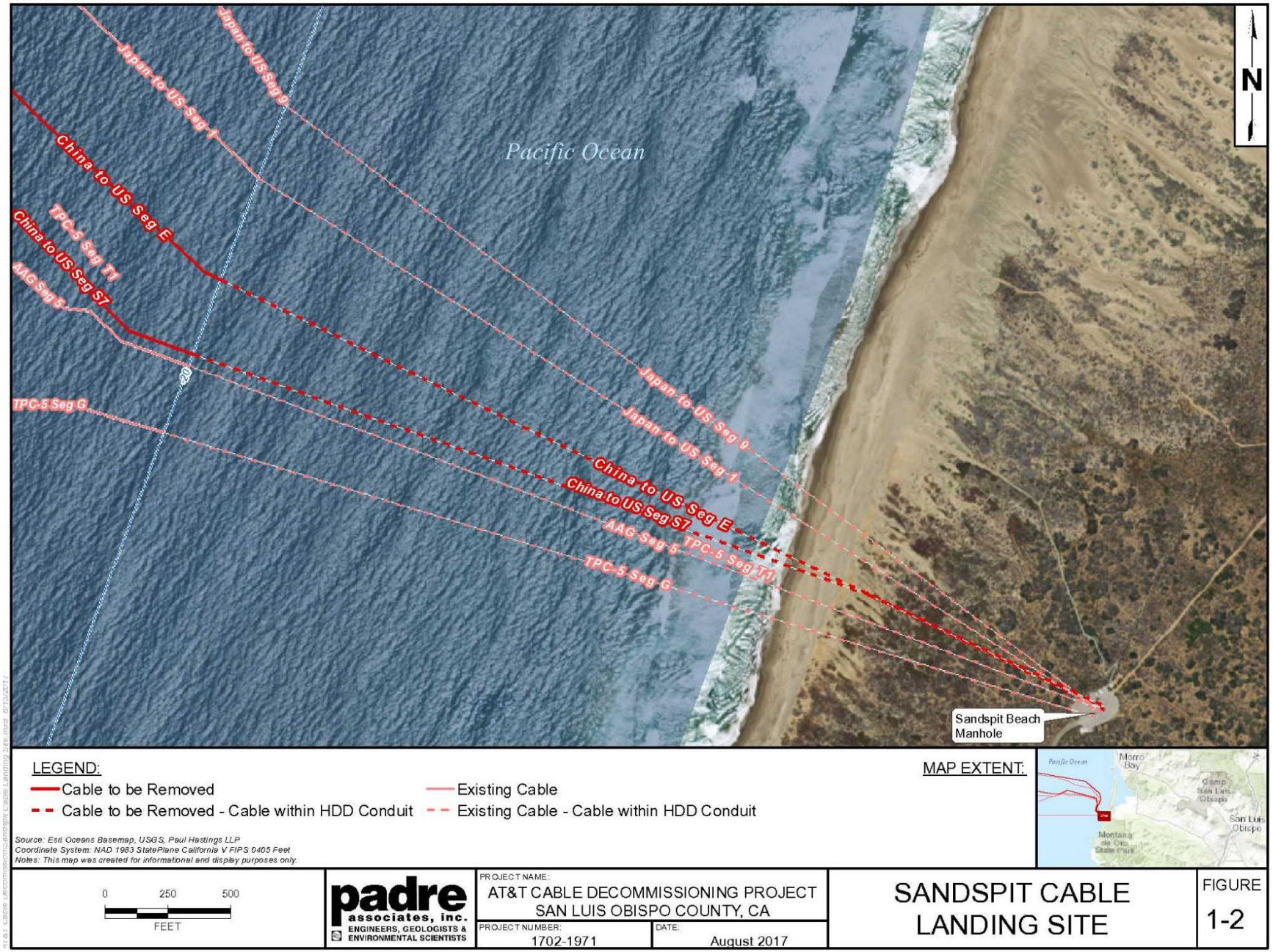
In approving installation of the cables, the Commission imposed the following requirement (Item 13, April 20, 2000 [CSLC 2000a]):

> *The State Lands Commission will require AT&T, upon the abandonment of the cables, to remove all conduit and inactive cables from the Mean High Tide Line to a water depth of 1,000 fathoms, as necessary so as not to interfere with commercial fishing activities. Prior to removal of any conduit or cable, AT&T will submit plans and specifications to the State Lands Commission and the California Coastal Commission that describe the proposed removal process.*

Although expected to operate for 25 years, Cable Segments E1 and S7 are now obsolete. AT&T notified Commission staff of its intent to remove the cable segments from State lands and terminate Lease Nos. PRC 8154.1 and PRC 8278.1, pursuant to Section 2, Paragraph 20 of each lease. (The conduit system is under separate lease to MFS Globenet, Inc., and would remain in place for potential future use.)

[1] The "2000 Project Final EIR" (State Clearinghouse [SCH] No. 99051063; CSLC 2000b) is incorporated by reference and included as Appendix A.


Monterey Bay
Marine Sanctuary
Approximate 12-Mile Limit
Approximate 3-Mile Limit
China to US Seg E
TPC-5 Seg T1
Japan to US Seg 9
China-to-US Seg S7
AAG Seg 5
Japan to US Seg 1
TPC-5 Seg G
Sandspit Beach
Manhole
Estero Bay
San Luis Obispo Bay
Santa Lucia
CAMBRIA
PASO ROBLES
ATASCADERO
MORRO BAY
LOS OSOS
SAN LUIS OBISPO
PISMO BEACH
ARROYO GRANDE
NIPOMO
SANTA MARIA
Santa Maria
Salinas River
N
LEGEND:
Existing Cable
Cable to be Removed
1,000 Fathom Depth
Marine Sanctuary Boundary
MAP EXTENT:
SAN LUIS OBISPO COUNTY
Source: Esri Oceans Basemap, USGS
Coordinate System: NAD 1983 StatePlane California V FIPS 0405 Feet
Notes: This map was created for informational and display purposes only.
0 5 10
Miles
padre associates, inc.
ENGINEERS, GEOLOGISTS & ENVIRONMENTAL SCIENTISTS
PROJECT NAME:
AT&T CABLE DECOMMISSIONING PROJECT
SAN LUIS OBISPO COUNTY, CA
PROJECT NUMBER:
1702-1971
DATE:
August 2017
CABLE ROUTES MAP
FIGURE
1-1


Pacific Ocean
Japan to US Seg 9
Japan to US Seg 1
China to US Seg E
TPC-5 Seg T1
China to US Seg S7
AAG Seg 5
TPC-5 Seg G
Sandspit Beach Manhole
N
LEGEND:
Cable to be Removed
Cable to be Removed - Cable within HDD Conduit
Existing Cable
Existing Cable - Cable within HDD Conduit
MAP EXTENT:
Source: Esri Oceans Basemap, USGS, Paul Hastings LLP
Coordinate System: NAD 1983 StatePlane California V FIPS 0405 Feet
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FEET
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SAN LUIS OBISPO COUNTY, CA
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1702-1971
DATE:
August 2017
SANDSPIT CABLE LANDING SITE
FIGURE
1-2

1.2 PROJECT OBJECTIVES

The objective of the proposed AT&T Removal of Segments E1 and S7 of the China–U.S. Cable Network, Lease Numbers PRC 8154.1 and PRC 8278.1 (Cable Removal Project) is the modification of Leases PRC 8154.1 and PRC 8278.1 and complete removal of the E1 and S7 cable segments from Montaña de Oro State Park to a water depth of 1,000 fathoms (6,000 feet) to support future termination of the leases.

1.3 ADDENDUM PURPOSE AND NEED

In addition to analyzing the potential significant environmental effects associated with installation of Cable Segments E1 and S7, the 2000 Project Final EIR also broadly analyzed the potential significant environmental effects associated with future removal of the cable segments and concluded that removal would have impacts similar to or less than installation. As required by its leases, AT&T submitted for Commission approval a plan for cable removal that includes Applicant Proposed Measures (APMs) to reduce or avoid interference with commercial fishing activities along and near the cable routes.

The Commission, as CEQA lead agency, prepared this Addendum to the EIR because changes or additions to the 2000 Project Final EIR are needed but such modifications do not require preparation of a subsequent EIR (see State CEQA Guidelines, §§ 15164 and 15162).[2] As discussed in Section 3.0, *Environmental Analysis*, removal of Cable Segments E1 and S7 would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects. While circulation of the Addendum for public review is not required, the Commission must consider the Addendum with the previously certified 2000 Project Final EIR before taking action on the Project (State CEQA Guidelines, § 15164, subds. (c) and (d)).

[2] Circumstances requiring a subsequent EIR are (State CEQA Guidelines, § 15162, subd. (a)):
(1) Substantial changes are proposed in the project which will require major revisions of the previous EIR…due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects;
(2) Substantial changes occur with respect to the circumstances under which the project is undertaken which will require major revisions of the previous EIR due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified effects; or
(3) New information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified as complete, shows any of the following:
(A) The project will have one or more significant effects not discussed in the previous EIR;
(B) Significant effects previously examined will be substantially more severe than shown in the EIR;
(C) Mitigation measures or alternatives previously found not to be feasible would in fact be feasible, and would substantially reduce one or more significant effects of the project, but the project proponents decline to adopt the mitigation measure or alternative; or
(D) Mitigation measures or alternatives which are considerably different from those analyzed in the previous EIR would substantially reduce one or more significant effects on the environment, but the project proponents decline to adopt the mitigation measure or alternative.

2.0 CABLE REMOVAL PROJECT COMPONENTS

The Cable Removal Project includes the following primary components:

- Pre-project preparation activities; including identification and demarcation of E1 and S7 offshore cable segments
- Removal of E1 and S7 onshore cable segments at an existing manhole/conduit located at the Sandspit parking lot at Montaña de Oro State Park through to nearshore bore pipe entry offshore in 43 feet of water
- Removal of E1 and S7 nearshore and offshore cable segments from nearshore bore pipe entry out to approximately 1,000 fathoms (6,000 feet) water depth using the Marine Vessel (M/V) Layla (or equivalent vessel)

2.1 PRE-PROJECT PREPARATION ACTIVITIES

2.1.1 Remote Operated Vehicle (ROV) Survey(s)

In accordance with the 2000 Project Final Environmental Impact Report (EIR) and lease conditions, regular ROV surveys were conducted, most recently in 2015, along the E1 and S7 cable routes out to a water depth of 1,000 fathoms (6,000 feet) to evaluate the cable condition and determine if it is exposed (see Appendix C for 2015 ROV survey results). The ROV surveys confirmed that the cables remain covered and largely unchanged since original installation. Based on the shallow cover depth (3 feet), recovering the cables by direct extraction (pulling) from the seafloor is feasible and de-trenching using mechanical methods is not required.

2.1.2 Identification of Cables (Set Tone at 25 Hertz)

AT&T maintains submarine cable records and, as noted above, last surveyed the cables in 2015. AT&T will use these records to locate the cables on the seafloor. Technicians in the cable station may also inject a 25 Hertz test set tone (inaudible) signal onto the copper conductor of the cable that can be picked up by a magnetometer on the cable recovery ship or an ROV to help locate and distinguish Project cables from others.

2.1.3 Delineation of Lines with Marker Buoys

Prior to arrival of the cable recovery vessel, M/V Layla, the contractor will place buoys to mark the nearshore portion of the cables. Divers will swim the route with a tone receiver and track the cable to the nearshore conduit borehole, where they will place another marker buoy. They will then continue tracking the cable route with the tone receiver, placing marker buoys at predetermined distances along the cable to help position the cable recovery vessel. All buoys will be removed and placed on the cable recovery vessel as the cable reaches the ship's deck.

2.2 REMOVAL OF ONSHORE CABLE SEGMENTS FROM MANHOLE TO NEARSHORE BORE-HOLE CONDUIT

Shore-end activity consists of pulling the E1 and S7 cable segments onshore through the beach manhole located in the Montaña de Oro State Park's Sandspit parking lot (Figure 1-1) after disconnecting the cables from existing land power and fiber cables. Cable recovery activities onshore are expected to occupy about 25 of 50 parking spaces in the Sandspit parking lot for 1 to 2 weeks. Access for this portion of the work will be governed by an existing easement with San Luis Obispo County (County). AT&T will work with the County and California Department of Parks and Recreation to minimize disruption to visitors during this limited period of onshore activities.

The shore-end contractor will excavate a trench approximately 6 feet wide by 20 feet long in the beach parking lot to expose the end of the bore pipe (which is not connected and is located about 20 feet from the existing beach manhole). Offshore divers will concurrently expose the nearshore end of the bore pipe conduit. After both ends of the bore pipe and cables are exposed, a power winch positioned at the manhole will pull the E1 and S7 cables up through the bore pipe. The cable pull will take approximately 1 day. No lubricants will be used during cable pulling process. Once the cables have been recovered, the excavation will be backfilled and compacted and the surface restored to original condition. The cables will be temporarily stored onshore and then transferred to the offshore cable recovery vessel for transport to a cable recycling facility.

2.3 REMOVAL OF OFFSHORE CABLE SEGMENT FROM CONDUIT TO 1,000 FATHOMS

2.3.1 Cable Recovery Vessel (M/V Layla - Mertech Marine)

Offshore cable recovery would be conducted on the M/V Layla (International Maritime Organization number 7420936), or similar dedicated industry vessel configured to support offshore cable installation and recovery efforts (Figure 2-1). Cable recovery can be accommodated in one vessel-load (no offloading cable will be required). Vessel details are as follows.

- Owned by Mertech Marine, with Port of Registry in St. John's, Virgin Islands
- 1,010 gross registered tons with a length of 216 feet, draft of approximately 13.85 feet, and a ballast water capacity of 251 metric tons

Figure 2-1. M/V Layla

- Speed of 9 nautical miles per hour (knots) propelled by single Caterpillar 3512(B) diesel engine with an output of 749 kilowatts and 1,600 revolutions per minute
- Registered by Bureau Veritas as a Tier I vessel, certificated by the International Air Pollution Prevention, and contains a Ship Energy Efficiency Management Plan that limits air emissions significantly
- Equipped with four cable tanks and a cable recovery system comprised of a main winch (to provide pulling force for cable recovery) and tensioners (to provide auxiliary tension for the winch and to transport recovered cable to the cable tanks)

2.3.2 Support Vessel(s)

One to two support vessels will support the recovery of cable in water depths that are too shallow for the M/V Layla to operate. Support vessel(s) would likely be 19- to 26-foot rigid inflatable boats powered by twin four-stroke outboard motors. Alternatively, support vessels may originate from Port San Luis (or other nearby California ports) and would be chosen based on appropriate capabilities to assist with cable recovery efforts.

2.3.3 Debris Management

All cable recovery procedures and methodologies are designed to minimize the release of debris into the ocean. All debris produced on board all vessels will be handled in accordance with international, national, and state regulations. Very small amounts of waste may be generated by the Project, which will be managed and collected on the offshore vessels and properly disposed of onshore. A log book will be maintained on all work vessels to track any objects that fall into waters, as to types, date, time and location during offshore operations to facilitate identification and location of debris for recovery and site clearance verification. Any waste generated during the shore-end activities will also be collected and disposed of properly.

2.3.4 Anchoring

Prior to cable recovery, the M/V Layla will arrive and set up on station within 50 feet of the end of the bore pipe. The M/V Layla will use a four-point mooring with an anchor spread of approximately 330 feet. This boat will be accompanied by a smaller secondary work boat that will assist with anchor setting and retrieval. All anchors will be set and retrieved vertically to avoid dragging and set on previously surveyed soft bottom pursuant to a Marine Safety and Anchoring Plan (MSAP) prepared by Mertech based on detailed and current maps of seafloor substrate conditions available (Applicant Proposed Measure [APM]-1). The MSAP will include maps, with coordinate locations specified, of high-relief areas that could be subject to disturbance from anchoring by project vessels and shall designate such areas as **"no-anchor zones"** on final approved plans for cable installation. Once the end of the conduit pipe and cables have been exposed, cable recovery will proceed without use of anchors as described below.

2.3.5 Cable Recovery Scope and Methodology

Prior to recovery, the E1 and S7 cables will be surveyed, identified, and delineated with buoys awaiting the cable recovery vessel (M/V Layla). Nearshore work will be conducted during daytime hours (approximately 12 hours/day) for 2 to 3 days. Offshore work will be completed by the M/V Layla working 24 hours per day for approximately 12 days. The offshore cable recovery methodology provided by Mertech is as follows (see Figure 2-2 for a top view of cable recovery activities while underway).

- The M/V Layla would be positioned offshore on the cable route at a point close to shore (see Section 2.3.4, *Anchoring*).
- The onshore crew would pump air through the bore pipe. The contractor will send divers down to locate (following the air bubbles) and expose the end of the pipe. The volume of sea floor sediment that will be jetted to expose the end of the pipe will be approximately 10 to 15 cubic yards.
- A messenger cable will be run with assistance from divers and possibly a support vessel from the M/V Layla to the cable ends exposed at the bore-hole conduit. At the vessel, the messenger rope will be connected to the ground rope. The ground rope will be hauled towards its required position with assistance of the excavator and connected to the cable end with appropriate rigging. The vessel will be positioned with the bow towards shore. When the ground rope is safely connected to the cable stopper on the vessel, the ground rope will be guided through the two tensioners and the traction winch towards the bow roller. At the bow roller, the cable will be guided to the stern of the vessel and connected to the center bollard. A load cell will be installed to measure pull forces.
- The vessel will rotate 180 degrees (with the bow facing seaside) and sail with a slow constant speed in line with the cable route while pulling the ground rope until the approximately 400-foot section of cable is de-trenched. Once the cable is free, the rigging (including load cell) on the vessel stern will be disconnected.

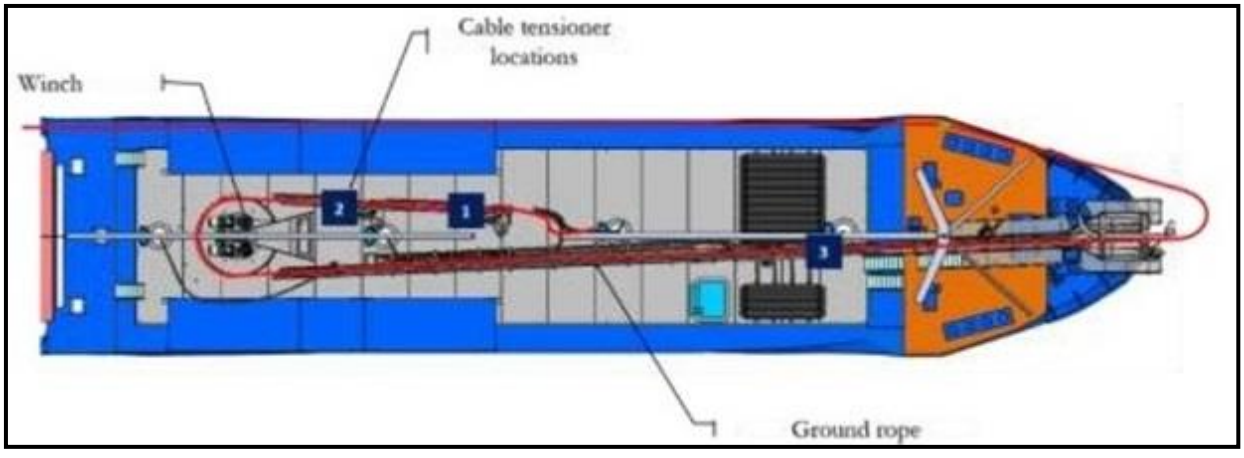

Figure 2-2. M/V Layla During Cable Recovery Operations (Top View)

- The M/V Layla will then begin retrieving the de-trenched cable section by slowly sailing back to its starting position. The ground rope will be retrieved via the bow of the vessel using the traction winch and tensioners and stored on the vessel deck. When the cable end is at the second tensioner, the ground rope will be disconnected from the cable. The cable will be loaded into one of the M/V Layla's cable tanks. After completion of the recovery of the 400 feet of cable, cable recovery work will continue according the offshore recovery procedures.
- The M/V Layla will pull itself forward using the cable while recovering towards the 1,000-fathom cut point (approximately 55 miles offshore). The cable will be pulled vertically, in alignment with its position on the seafloor to avoid contact with higher relief hardbottom substrate. Upon arrival at the 1,000-fathom depth, the cable(s) are cut, appropriate rigging is attached, and the remaining cable ends are left on the seabed past 1,000 fathoms offshore.

2.3.6 Contingencies (Severe Weather Curtailment)

The Project vessels and methodology include a MSAP (APM-1 [see Section 2.3.4, *Anchoring*]) that also serves to plan for severe weather events. The MSAP includes provisions such as daily weather reporting, extended forecasts, and selection of a work window to optimize anticipated sea conditions. If these conditions are exceeded, or are expected to worsen, measures will be taken to secure operations. Depending on the predicted severity of the storm, the ship will either ensure that enough cable is laid out to give maneuvering room, or will suspend operations completely, and cut the cable. The vessel will then either stand offshore until the weather improves, or seek shelter in port. The power to determine and respond to critical conditions resides with the captain of the ship, who is ultimately responsible for the safety of the ship and its personnel.

2.3.7 Demobilization and Recycling of Recovered Cable

The recovered cables will be spooled on the M/V Layla and transported to a Mertech-owned dismantling/recycling factory in Cape Town, South Africa. The dismantling process, which is fully mechanical without any smelting required to recover cable materials, breaks down the out-of-service cables into their component parts which are then sold to various industries as copper, polyethylene, steel and aluminum.

2.4 EQUIPMENT REQUIREMENTS

Cable recovery will require the use of ocean going vessels and heavy-duty equipment. The M/V Layla (or equivalent) will be used for cable recovery with support by rigid inflatable boats. Cable recovery operations will be completed in approximately 2 weeks. Table 2-1 lists the primary equipment required for the Cable Removal Project.

Table 2-1. Project Equipment List

Equipment Type		Horsepower	Hours/Day	# Days
Onshore - 12 Hours/Day				
(1) Backhoe (Unearthing Manhole to Conduit)		105 hp	12	2-3
(1) Winch		100 hp	12	2-3
Offshore - 12 Hours/Day				
Cable Recovery Vessel - M/V Layla	(1) Caterpillar Engine	749 kW / 1,000 hp	24	12
	(1) Caterpillar Generator	360 kW / 482 hp	24	12
	(1) Main Winch (Electrically Driven)	-	24	12
	(1) Tensioner (Electrically Driven)	-	24	12
Cable Assist Vessel(s)	(2) Engines-Twin, 4-stroke outboards	60 hp	12	2-3
	(1) Air Lift - Powered by Compressor	-	12	2-3
	(1) LP Air Compressor	300 cfm	12	2-3

Acronyms: cfm = cubic feet per minute; hp = horsepower; kW = kilowatts.

2.5 PERSONNEL REQUIREMENTS

Onshore work will be completed by a crew stationed at Montaña de Oro State Park. Onshore and nearshore work will be conducted during daytime hours (approximately 12 hours per day) for 2 to 3 days. Offshore work will be completed by the M/V Layla and offshore diving crew; working 24 hours per day, for approximately 12 days. Work activities would require approximately 23 to 24 persons as shown in Table 2-2.

Table 2-2. Personnel Requirements

Cable Recovery Vessel (M/V Layla) Crew		Dive Vessel Crew	
1	Project Manager	1	Diving Support Supervisor
1	Site Manager	1	Diving Support Vessel Master
1	Shipboard Manager	4	Diving Support Team
1	Cable Recovery Vessel Master	2	Diving Support Vessel Deck Crew
5	Cable Recovery Vessel Deck Crew	**8**	**TOTAL**
4	Ship Crew	**Onshore Crew**	
2-3	Marine Mammal Observers	2	Technicians
13-14	**TOTAL**	**2**	**TOTAL**

2.6 PROJECT SCHEDULE

Project operations are currently anticipated to take place in early 2018. Nearshore Project activities will be conducted during daylight hours (approximately 12 hours/day), for approximately 2 to 3 days. Offshore Project activities are expected to be conservatively completed in 12 days offshore; for a total recovery schedule of approximately 2 weeks.

2.7 MEASURES TO REDUCE POTENTIAL IMPACTS

The following technical work plans have been (or will be) developed as part of the proposed Cable Removal Project:

- APM-1. Marine Safety and Anchoring Plan (MSAP) (Mertech - M/V Layla)
- APM-2. Oil Spill Contingency and Response Plan (OSCRP)
- APM-3. Marine Wildlife Mitigation and Training Plan (MWMTP)
- APM-4. Non-Native Aquatic Species (NAS) Introduction Prevention
- APM-5. Equipment Specifications and Emissions Reduction Plan
- APM-6. Local Notice to Mariners
- APM-7. Notification of Morro Bay Joint Cable/Fisheries Liaison Committee, Morro Bay Harbormaster, Morro Bay and Port San Luis Commercial Fishermen's Associations, and other local fishermen who request it

Mitigation measures (MMs) identified in the 2000 Project Final EIR (SCH No. 99051063, EIR # 698) have also been incorporated into the Cable Removal Project to reduce the potential for environmental impacts. Table 2-3 includes those APMs and MMs that are applicable to cable recovery activities; it does not include measures that have been completed for other phases of the Project during cable installation or those that are no longer applicable. Minor changes to applicable MMs specific to the Cable Removal Project are noted in the text of the measure below as either strikethrough (removed text) or underlined text (added or modified text). No new mitigation measures are required.

Table 2-3. Summary of APMs and Final EIR Adopted MMs Applicable to Cable Removal Project

AIR QUALITY
APM-5. Equipment Specifications and Emissions Reduction Plan **MM AQ-1**. The injection timing on diesel powered vessels will be retarded 4° prior to and throughout cable installation (recovery) with the exception of the main cable ships which will be operated at 3° retardation. These measures will produce a 20-25 percent reduction in emissions of nitrogen oxides (NOx). **MM AQ-2**. Onshore equipment will use low-sulfur/low-aromatic diesel fuel as designated by the ARB. Ocean vessels will burn low-sulfur diesel fuel as designated by the [U.S.] EPA. **MM AQ-3.** With the exception of marine vessel injection timing retard (AQ-1), all diesel-powered construction equipment will be properly tuned, well maintained, and operated within manufacturer's specifications. **MM AQ-4.** AT&T will contribute the ~~$6,000~~ appropriate fees to the San Luis Obispo (SLO) County APCD program based on the average costs of air quality offsets provided by the SLO County APCD CEQA Handbook, to offset the temporary exceedance of daily NOx emissions.

Table 2-3. Summary of APMs and Final EIR Adopted MMs Applicable to Cable Removal Project

BIOLOGICAL RESOURCES
APM-1 Marine Safety and Anchoring Plan (this APM will also address MM MB-1) **APM-2. Oil Spill Contingency and Response Plan (OSCRP)** **APM-3. Marine Wildlife Mitigation and Training Plan (MWMTP)** **APM-4. Non-Native Aquatic Species (NAS) Introduction Prevention** **MM MB-1.** Based on the most detailed and current maps of seafloor substrate conditions available, high-relief areas that could be subject to disturbance from anchoring by project vessels should be mapped with coordinate locations specified and designated as "no-anchor zones" on final approved plans for cable installation. (These areas shall continue to be shown on as-builts and project maps that could be used in future repair or abandonment activities.) **MM MB-2.** A marine mammal training video or photographic presentation shall be reviewed by all shipboard personnel involved with cable operations to emphasize the types of mammals that may occur in the Project area, general habits and distribution, and methods to avoid impacts. Included in the presentation shall be a listing of contact numbers to report marine mammals in distress, and a requirement to make a verbal report if any such mammals are observed during project operations. **MM MB-3.** A biologist familiar with marine mammal behavior shall be present during removal activities to observe for marine mammals that approach the project area. The observer shall be authorized to call a halt to project activities that pose a risk of injury to marine mammals. **MM CRF-1(e) (ROV Surveys).** Survey or other means, as appropriate and as needed, will document post recovery seafloor conditions.
COMMERCIAL AND RECREATIONAL FISHING
APM-6. Local Notice to Mariners **APM-7. Notification of Morro Bay Joint Cable/Fisheries Liaison Committee et al.** **MM CRF-1.** To mitigate impacts on commercial and recreational fishing resulting from the China-U.S. project, the following measures shall be implemented: • Throughout the life of the project, AT&T will adhere to the noticing procedures that are specified in the project description (section 2.10.7). • [MMs removed related to the installation and ongoing operation of the cables]. • When the cables to be installed are taken out of service, AT&T will submit a plan for their removal as necessary so as not to interfere with commercial fishing activities in areas where such cables were previously installed.
CULTURAL RESOURCES / TRIBAL CULTURAL RESOURCES
MM CR-2. Should a previously unknown shipwreck of potential cultural resource value be discovered within the proposed cable corridor as a result of the study required in CR-1, the proposed cable route or installation (recovery) procedures shall be modified to avoid the potentially significant cultural resource. **MM CRF-1(e) (ROV Surveys).** Survey or other means, as appropriate and as needed will be used to confirm recovery of cables will not disturb cultural resources.
GEOLOGY
APM-1. Marine Safety and Anchoring Plan (MSAP) **MM CRF-1(e) (ROV Surveys).** Survey or other means, as appropriate and as needed, will document post recovery seafloor conditions.

Table 2-3. Summary of APMs and Final EIR Adopted MMs Applicable to Cable Removal Project

GREENHOUSE GAS EMISSIONS
APM-5. Equipment Specifications and Emissions Reduction Plan **MM AQ-1**. The injection timing on diesel powered vessels will be retarded 4° prior to and throughout cable installation (recovery) with the exception of the main cable ships which will be operated at 3° retardation. These measures will produce a 20-25 percent reduction in emissions of nitrogen oxides (NOx). **MM AQ-2**. Onshore equipment will use low-sulfur/low-aromatic diesel fuel as designated by the ARB. Ocean vessels will burn low-sulfur diesel fuel as designated by the [U.S.] EPA. **MM AQ-3.** With the exception of marine vessel injection timing retard (AQ-1), all diesel-powered construction equipment will be properly tuned, well maintained, and operated within manufacturer's specifications. **MM AQ-4.** AT&T will contribute the ~~$6,000~~ appropriate fees to the San Luis Obispo (SLO) County APCD program based on the average costs of air quality offsets provided by the SLO County APCD CEQA Handbook, to offset the temporary exceedance of daily NOx emissions.
HAZARDS AND HAZARDOUS MATERIALS (SYSTEM SAFETY/RISK OF UPSET)
APM-1. Marine Safety and Anchoring Plan (MSAP) **APM-2. Oil Spill Contingency and Response Plan (OSCRP)**
HYDROLOGY AND WATER QUALITY
APM-1. Marine Safety and Anchoring Plan (MSAP) **APM-2. Oil Spill Contingency and Response Plan (OSCRP)**
LAND USE
MM REC-1. Prior to cable ~~installation~~ recovery, AT&T shall obtain the approval of the Department of Parks and Recreation, the County, and/or the staff of the State Lands Commission, as necessary, for the scheduling and location of project activities at the parking lot, incorporating measures to minimize impacts on the availability of parking, restrooms, and pedestrian access to the beach during project activities.
MARINE TRANSPORTATION
APM-1. Marine Safety and Anchoring Plan (MSAP) **APM-6. Local Notice to Mariners** **APM-7. Notification of Morro Bay Joint Cable/Fisheries Liaison Committee et al.**
RECREATION
MM REC-1. Prior to cable ~~installation~~ recovery, AT&T shall obtain the approval of the Department of Parks and Recreation, the County, and/or the staff of the State Lands Commission, as necessary, for the scheduling and location of project activities at the parking lot, incorporating measures to minimize impacts on the availability of parking, restrooms, and pedestrian access to the beach during project activities.
SOCIOECONOMICS
APM-6. Local Notice to Mariners **APM-7. Notification of Morro Bay Joint Cable/Fisheries Liaison Committee et al.**
NO MITIGATION MEASURES REQUIRED
• **AESTHETICS** • **NOISE**
NOT APPLICABLE
• **PUBLIC SERVICES** • **UTILITIES AND SERVICE SYSTEMS**

Acronyms: APM = Applicant Proposed Measure; MM = Mitigation Measure

3.0 ENVIRONMENTAL ASSESSMENT

The following comparative analysis was undertaken to analyze whether the revised AT&T China-U.S. Cable Network, Segments E1 and S7 Removal Project (Cable Removal Project) proposed by AT&T would have any significant environmental impacts that were not previously addressed in the Final Environmental Impact Report (EIR) for the original Project certified by the CSLC in 2000 (2000 Project Final EIR [CSLC 2000b]). The comparative analysis discusses: 1) whether impacts are increased, decreased, or remain unchanged from the conclusions discussed in the 2000 Project Final EIR; and 2) whether any changes to existing mitigation measures or the inclusion of additional mitigation measures are warranted or required.

This Addendum to the EIR does not address two environmental issue areas that were also not addressed in the 2000 Project Final EIR, "Public Services" and "Utilities and Service Systems," because the short-term and temporary installation of Cable Segments E1 and SF did not affect then-existing services (e.g., fire, water, police, or schools) or utilities. Removal of the cables, which are now obsolete, would also be short-term and temporary, the Cable Removal Project would have no new significant impacts to Public Services or Utilities and Service Systems, and no new mitigation measures are required.

3.1 AESTHETICS

The 2000 Project Final EIR concluded that "short-term relatively minor changes in the physical environment" including construction noise, would affect the visual (aesthetic) and auditory perceptions of visitors to Montaña de Oro State Park or adjacent residents. This Addendum analyzes potential significant impacts to aesthetics below and potential significant impacts associated with noise separately (see Section 3.12).

The installed cables are submerged below the ocean surface or located in underground conduits along Los Osos Valley Road. As a result, during installation, the only Project components visible were associated with the cable-laying vessel and temporary construction equipment located in designated staging areas of the Montaña de Oro State Park Sandspit parking lot. The 2000 Project Final EIR concluded that Project activities as seen from selected viewpoints in the Project area or from commercial or recreational vessels did not result in views that were out of character with surrounding visual conditions, nor did these activities significantly change existing visual conditions. The 2000 Project analysis did not identify any significant effects to the visual character or environment (i.e., impacts were determined to be less than significant), and no mitigation measures were required.

Aesthetic impacts resulting from Cable Removal Project activities would be similar to those discussed in the 2000 Project Final EIR. Cable removal activities would not result

in any long-term or permanent changes to the existing offshore, nearshore or onshore environments. Construction activities would be limited to a 2-week (or less) timeframe in early 2018 when recreational use of Montaña de Oro State Park is reduced. Cable removal activities within the Park would be limited to construction equipment for a few days. Following removal of the cables, staging areas would be returned to pre-Project conditions and no long-term or permanent impacts would result. Therefore, cable removal activities would result in a less than significant impact to visual resources. No new mitigation measures are necessary. Compared to the activities analyzed in the 2000 Project Final EIR, the Cable Removal Project would not create new significant environmental effects or increase the severity of previously identified significant effects related to aesthetics.

3.2 AIR QUALITY

The Cable Removal Project is located within the San Luis Obispo (SLO) County Air Pollution Control District (APCD). The APCD shares responsibility with the California Air Resources Board (CARB) for ensuring attainment of State and Federal ambient air quality standards in the County. The APCD has jurisdiction under the California Health and Safety Code to develop emission standards (rules) for the County, issue air pollution permits, and require emission controls for stationary sources in the County.

The APCD has developed thresholds of significance for project construction and project operational phases. Because the Cable Removal Project does not have an operational phase, only the construction phase thresholds presented in Table 3.2-1 apply. When projected fugitive and combustion emissions equal or exceed the established construction thresholds, mitigation is required. These thresholds have been modified since the 2000 Project Final EIR was certified, and therefore new analysis of the Project emissions with respect to cable removal activities is presented below.

Table 3.2-1. SLO County APCD Construction Thresholds of Significance

Pollutant	Threshold [1]		
	Daily (pounds [lbs.])	Quarterly (tons)	
		Tier 1	Tier 2
NO_x + ROG (combined)	137 lbs.	2.5	6.3
DPM	7 lbs.	0.13	0.32
Fugitive Particulate Matter (PM_{10}), Dust [2]	--	2.5	

Source: SLO County APCD 2012

Notes:

[1] Daily and quarterly emission thresholds are based on the California Health and Safety Code and the California Air Resources Board Carl Moyer Guidelines.

[2] Any project with a gradient area greater than 4.0 acres of worked area can exceed the 2.5-ton PM_{10} quarterly threshold.

The 2000 Project did not introduce any new or long-term sources of air emissions to the Project area. Removal of Cables E1 and S7 will require the use of similar onshore and offshore equipment including backhoes, generators, compressors, winches, hauling trucks, and marine vessels as well as vehicles used by construction workers commuting to and from the Project area. Nearshore work will be temporary and conducted during daytime hours (approximately 12 hours/day) for 2 to 3 days. Offshore work will be completed by the M/V Layla working 24 hours per day for approximately 12 days. Table 3.2-2 shows anticipated peak day and total emissions for the Cable Removal Project. As shown in Table 3.2-2, total emissions for nitrogen oxides (NOx) and reactive organic gases (ROG) combined are estimated at 301.43 pounds (lbs.)/day, which exceeds the peak daily APCD emissions threshold of 137 lbs./day for NOx and ROG combined. Please refer to Appendix D for the air quality calculation spreadsheets.

Table 3.2-2. Projected Project Peak Day and Total Emissions

Source	NO_x	ROG	PM_{10}	$PM_{2.5}$	DPM	CO	SO_2
	Peak Day Emissions (Pounds [lbs.]/Day)						
Backhoe	5.920	0.880	0.425	0.425	0.015	5.806	0.009
Cat Generator	92.470	4.510	1.585	1.585	0.189	26.42	0.094
Compressor (LP)	3.000	0.483	0.172	0.172	0.006	2.162	0.005
Outboard Motor	7.430	7.945	0.082	0.082	0.000	207.83	0.000
Vessel Engine (M/V Layla)	167.000	4.601	5.112	5.112	2.512	25.56	22.153
Winch	6.330	0.859	0.441	0.441	0.016	5.961	0.010
Peak Day	**282.150**	**19.278**	**7.818**	**7.818**	**2.739**	**273.74**	**22.271**
	Annual Emissions (Tons)						
Total Project Emissions	1.591	0.070	0.042	0.042	0.016	0.645	0.134

Acronyms: NO_x = nitrogen oxides, ROG = reactive organic gases, PM10 and PM2.5 = particulate matter, DPM = diesel particulate matter, CO = carbon monoxide, SO_2 = sulfur dioxide.

Although an exceedance of the established peak daily threshold would result, AT&T and Mertech Marine will implement all commercially feasible best practices to minimize NOx emissions pursuant to Applicant Proposed Measure (APM)-4, Equipment Specifications and Emissions Reduction Plan. AT&T will also implement the mitigation measures required in the 2000 Project Final EIR. Implementation of these measures will result in a less than significant impact to air quality. The same approach to mitigating air quality impacts was taken during cable installation, which was estimated within the Final EIR to have greater significant impacts over a longer duration. As such, no new impacts have been identified and no new mitigation measures are necessary. Compared to the activities analyzed in the 2000 Project Final EIR, the Cable Removal Project would not create new significant environmental effects or increase the severity of previously identified significant effects related to air quality.

3.3 BIOLOGICAL RESOURCES

The 2000 Project Final EIR evaluated potential significant impacts to marine biological resources resulting from the 2000 Project and alternatives in Section 4.5, *Biological Resources*. Cable removal activities would mostly occur offshore within the same areas as installation and are expected to have similar or fewer impacts.

3.3.1 Terrestrial Biological Resources

As with cable installation, onshore cable removal activities would be confined to the Sandspit parking lot. Use of the parking lot would be coordinated with Montaña de Oro State Park and San Luis Obispo County and would be consistent with prior approvals. No new or substantially more severe impacts to sensitive dune habitats or other onshore sensitive species or habitats are expected from cable removal activities.

3.3.2 Marine Biological Resources

Section 4.5.3 of the 2000 Project Final EIR analyzed impacts to the benthic environment and living communities, aquatic vegetation, and marine mammals and concluded that cable installation and cable removal activities would have similar impacts (with the exception that cable installation created a physical feature on the bottom). Since Cables E1 and S7 were installed to the maximum extent feasible in areas with no hardbottom substrate, the majority of the E1 and S7 cable lengths are located within soft-bottomed areas.

No significant changes to the offshore biological environment, including no new species of concern or significant changes to populations of existing marine species, have been identified within the Project area since cable installation. Since 2002, the five post-burial Remote Operated Vehicle (ROV) surveys that were conducted and submitted to permitting agencies have shown that more than 95 and 92 percent of Cable Segments E1 and S7, respectively, remain buried. In August 2015, Global Marine conducted the most recent Post-Installation Burial Verification Survey of the E1 and S7 Cables (Appendix C). This survey, which identified locations of buried cables, areas where hard bottom was present, and areas where the cables were exposed, also showed that approximately 92 to 95 percent of the cables are buried along the cable route. Locations where cables are exposed over rocky substrate show minimal signs of “grooving.” The exposed cable sections were encrusted with corallines and other benthic organisms.

Localized, temporary disturbance of seafloor habitats, primarily from turbidity involving an extremely small fraction of available substrate, will occur during cable recovery operations. Following removal of the cables from areas of soft substrate, the seafloor is expected to return to pre-project conditions as it did following installation. Removal of the cables from areas of rocky substrate, which show some “grooving” as stated above, would eliminate further abrasion on these substrates and would reduce the impact when

compared to the 2000 Project because removal of the two cables would occur after only 18 years instead of the originally expected 25 years. No new impacts have been identified and no new mitigation measures are required.

Marine mammals, including whales, dolphins, and sea otters, could occur in or migrate through the area during cable removal activities. Morro Bay harbor porpoise are year-round residents; Gray whales migrate through from December to May. Section 4.5.3 of the 2000 Project Final EIR discussed the potential for marine mammals to be harassed or entangled in the cables during installation and concluded that the risk of marine mammal disturbance or entanglement was low due to the slow speed of the vessel and the ability of the vessel to manage the "slack" on the cable as it was suspended between the vessel and the seafloor during installation. Based on observations during installation operations and associated post installation surveys, this analysis was shown to be accurate. Nonetheless, although unlikely, because vessel and cable interactions with marine mammals could occur during cable retrieval activities, AT&T commits to implementing the following APMs.

APM-1, Marine Safety and Anchoring Plan (MSAP). The MSAP will include maps, with coordinate locations specified, of high-relief areas that could be subject to disturbance from anchoring by Project vessels and shall designate such areas as "no-anchor zones" on final approved plans for cable installation.

APM-2, Oil Spill Contingency and Response Plan (OSCRP). AT&T will provide the OSCRP to CSLC staff for review and approval prior to the start of any offshore work activities. The Project-specific OSCRP will include preventative measures, as well as procedures to be followed in the event of a spill, including hydraulic fluids as well as fuel and other types of oil spills.

APM-3, Marine Wildlife Mitigation and Training Plan (MWMTP) for cable recovery activities. The Project-specific MWMTP, which will be equivalent to plans the CSLC previously approved for multiple passive cable surveys conducted by AT&T in 2015, will include updated species data and information, marine wildlife training requirements, requirements for marine wildlife monitors/observers, and procedures to be implemented during Project activities to avoid potential impacts to marine wildlife during Project operations.

In addition, MM MB-3 from the 2000 Project Final EIR requires that: "A biologist familiar with marine mammal behavior shall be present during removal activities to observe for marine mammals that approach the project area. The observer shall be authorized to call a halt to project activities that pose a risk of injury to marine mammals." Because cable recovery and cable installation activities are substantially similar and AT&T's APMs provide additional protection to marine biological resources, the Cable Removal Project would not create new significant environmental effects or an increase in the severity of previously identified significant effects compared to the activities analyzed in the 2000 Project Final EIR.

3.3.1.1 Non-native Aquatic Species

Non-native aquatic species (NAS), also known as non-indigenous aquatic species, include plants, animals, and micro-organisms that have been introduced or transported to new regions through various human activities. In coastal environments, commercial shipping is the most significant vector for invasions, and vessel biofouling and ballast water are considered the primary contributors of NAS. Once established, NAS can cause significant ecological, economic, and human health problems in the receiving environment, including altering the structure and function of ecosystems, causing declines in native and commercial fisheries, and spreading human pathogens.

The CSLC is the lead implementing agency for California's Marine Invasive Species Program (MISP), which strives to prevent NAS release from commercial vessels to state waters. The MISP began in 1999 with the passage of California's Ballast Water Management for Control of Nonindigenous Species Act, which addressed the threat of NAS introductions through ships' ballast water. In 2003, the Marine Invasive Species Act (MISA) was passed, reauthorizing and expanding the 1999 Act, which directed the CSLC to formulate recommendations to prevent or minimize the introduction of NAS discharges for vessels 300 gross registered tons or greater, capable of carrying ballast water, operating in state waters. The CSLC also regulates vessel biofouling under the MISA. Since 2008, the CSLC has required vessels subject to the MISA to submit an annual Hull Husbandry Reporting Form and regularly remove vessel biofouling. Reporting Form data and CSLC-funded biological research results help to identify management practices to reduce the risk of NAS introduction through vessel biofouling.

Due to the use of marine vessels, including the recovery vessel that would originate outside California, the Project may result in the spread of NAS through ballast water and vessel biofouling. However, the potential spread of NAS would be addressed through the implementation of APM-4.

APM-4: Non-Native Aquatic Species (NAS) Introduction Prevention. All Project vessels shall: (1) originate from an area including or south of Monterey Bay and an area north of Pt. Conception (2) be continuously based out of an area including or south of Monterey Bay and an area north of Pt. Conception since last dry docking; or (3) have underwater surfaces cleaned out-of-water in dry dock before entering central California at vessel origination point and immediately prior to transiting to the Project site. Alternatively, the Project vessel may submit the Marine Invasive Species Program Annual Vessel Reporting Form (AVRF) immediately after approval is granted to proceed with the project. Commission staff will review the AVRF and determine if out-of-water or in-water cleaning is required. Additionally, and regardless of vessel size, ballast water for all Project vessels must be managed consistent with CSLC ballast and biofouling management laws and regulations (Pub. Resources Code, § 71200 et seq. and Cal. Code Regs., tit. 2, § 2271 et seq.). The Project vessel shall submit a Ballast Water Management Report and the

Marine Invasive Species Program Annual Vessel Reporting Form (if not submitted previously for determination on the need for out-of-water cleaning) at least 24 hours in advance of arrival in California. Project vessels shall also be available for inspection by CSLC staff using a remotely operated vehicle for compliance assessment. Further, as part of the Project kickoff meeting, a qualified marine biologist, approved by CSLC staff, shall provide information to all Project personnel about the spread of NAS in California waters and the programs (CSLC Marine Invasive Species Program) that will be implemented to minimize this hazard.

3.3.1.2 Marine Protected Areas (MPAs)

In December 2012, 12 years after the 2000 Project Final EIR was certified, the California Department of Fish and Wildlife (CDFW) completed a statewide network of marine protected areas (MPAs) designed to protect or conserve marine life and habitat (CDFW 2014); the central California MPAs, from Pigeon Point to Point Conception, are one part of this network. The 29 protected areas in this region (28 MPAs and one marine recreational management area) cover approximately 204 square miles, or about 18 percent of the approximately 1,144 square miles of ocean, estuary, and offshore rock/island waters in central California state waters. The following summarizes the area designations managed within the central portion of the statewide MPA network.

#	Type	Description of MPA Designation
13	State Marine Reserve (SMR)	Prohibits damage or take of all marine resources (living, geologic, or cultural) including recreational and commercial take
15	State Marine Conservation Area (SMCA)	May allow some recreational and/or commercial take of marine resources (restrictions vary)
1	State Marine Recreational Management Area (SMRMA)	Limits recreational and commercial take of marine resources while allowing for legal waterfowl hunting to occur; provides subtidal protection equivalent to an MPA (restrictions vary)

Source: CDFW (2016); updated March 1, 2016).

Note: Major revisions and additions to central California MPAs went into effect in state waters on September 21, 2007.

The Project site is located on the seafloor offshore of San Luis Obispo County, California between two MPAs (Morro Bay and Point Buchon SMRs). While the Commission may consider these MPAs pursuant to its Public Trust responsibilities and its commitments under a 2015 Marine Protected Area Implementation Memorandum of Understanding, approval of the Central Coast MPA regulations in 2014 does not itself constitute or give rise to one of the circumstances described in State CEQA Guidelines section 15162 mandating additional environmental review.

With respect to the removal of the cables potentially impacting the sensitive marine resources within the nearby SMRs, the Commission evaluated potentially significant impacts related to cable installation in section 4.5.3 the 2000 Project Final EIR. The

Project cables (E1 and S7 of the China–U.S. Cable Network) come onshore via a bore pipe that extends underground to a manhole at the Sandspit parking lot approximately 0.82 mile from the nearest MPA (Morro Bay SMRMA). The cables (E1 and S7) do not traverse across any designated MPAs.

3.3.1.3 Marine Biological Resources Conclusion

Compared to the activities analyzed in the 2000 Project Final EIR, the Cable Removal Project would not create new significant environmental effects or increase the severity of previously identified significant effects related to marine biological resources, including interactions with marine mammals, through the spread of NAS through ballast water and vessel biofouling, or with respect to marine resources within nearby MPAs.

3.4 COMMERCIAL AND RECREATIONAL FISHERIES

Commercial and recreational fishing of a variety of types and home ports, including Morro Bay and Port San Luis, occurs in the Project area. The 2000 Project Final EIR identified the following potential impacts to commercial/recreational fishing in the Project area from installation of Cables E1 and S7: 1) short-term, localized preclusion of fishing areas during cable installation; 2) potential economic losses to local fisherman due to avoidance of cables; and 3) potential economic losses to fishermen due to gear entanglement on cables. These potential impacts were considered significant at both the Project-specific and cumulative levels and were mitigated to less than significant through MM CRF-1 developed by AT&T in coordination with local fishing interests.

MM CRF-1. To mitigate impacts on commercial and recreational fishing resulting from the China-U.S. project, the following measures shall be implemented:

a) Throughout the life of the project, AT&T will adhere to the noticing procedures that are specified in the project description.

b) AT&T will participate in and fund the operations of the Morro Bay Joint Cable/Fisheries Liaison Committee.

c) A Committee fisherman representative may be on board the cable installation vessel to observe cable installation.

d) Following installation of the cables, AT&T will provide cable “as built” coordinates.

e) AT&T will conduct burial verification of the cables every 18 to 24 months by Remote Operated Vehicle (ROV) and will provide to the Committee videotapes recording the verification.

f) Each licensed fisherman owning and operating trawling vessels cables who signs a Fishing Agreement will receive payment from the participating cable companies.

g) AT&T will provide a 24-hour toll-free telephone fishing “hotline.”

h) In the event that a fisherman sacrifices gear in order to avoid injury to an AT&T submarine cable, AT&T will pay the gear equipment replacement costs.

i) AT&T will release any claims that it might have for damage to cables against fishermen that comply with the terms of the applicable Fishing Agreement.

j) When the cables to be installed are taken out of service, AT&T will submit a plan for their removal as necessary so as not to interfere with commercial fishing activities in areas where such cables were previously installed.

Cable removal activities may also temporarily preclude fishing activities locally. In accordance with Title 47 U.S. Code, Chapter 2 (Submarine Cables, §§ 24 and 25), vessels unrelated to Project work activities must maintain a minimum safe distance of 1 nautical mile (6,000 feet) from Project cable removal operations. Implementation of this safe distance is designed to avoid navigational delays or unsafe situations. Due to the availability of the similar seafloor habitat and open water areas within the region, this less-than-significant impact is similar to that identified in the 2000 Project Final EIR. Additionally, AT&T will ensure the publication of a local Notice to Mariners, describing the nature, location, and duration of cable recovery activities, at least 15 days prior to initiation of activity (APM-6) and provide pertinent information directly to the Harbormaster at Morro Bay, to the Morro Bay and Port San Luis Commercial Fishermen's Associations, other local fishermen who request it, and to the Morro Bay Joint Cable/Fisheries Liaison Committee (Committee)[3] (APM-7).

Removal of the two cables (E1 and S7) to 1,000 fathoms will benefit fishing in the Project area, although other submarine cables will remain. As identified in the 2000 Project Final EIR, installation of the cables was anticipated to result in long-term significant, but mitigable, impacts to the fishing industry from loss of fishing grounds and potential entanglement with fishing gear. Removal of the cables from these fishing grounds will eliminate the potential for snagging of gear on Cable Segments E1 and S7.

Currently, and in accordance with 2000 Project MM CRF-1, if fishing gear becomes entangled with a submarine cable and must be sacrificed, the economic impact due to the cost of replacing lost gear, loss of catch, and loss of fishing opportunity is mitigated through payments made by AT&T to the affected party. Payment procedures are required within a Fishing Agreement overseen by the Committee. Removal of Cable Segments E1 and S7 would negate the need to compensate fishermen in accordance with CRF-1, part f, for economic loss due to unanticipated interactions between these cables and fishing gear. Submittal of the Cable Removal Project Execution Plan to the CSLC is also consistent with CRF-1, part j; this plan identifies how cable removal

[3] The Committee was formed to discuss and resolve issues relating to telecommunications cables owned and operated by the cable companies along the California coast adjacent to Morro Bay.

activities will avoid or minimize interference with commercial fishing activities in areas where cables were previously installed. Upon full removal, no further economic loss or potential gear damage associated with Cable Segments E1 and S7 will occur.

Therefore, no new or additional mitigation measures are required related to commercial and recreational fishing. Additionally, cable removal would reduce impacts associated with fishing identified in the 2000 Project Final EIR. Compared to the activities analyzed in the 2000 Project Final EIR, the Cable Removal Project would not create new significant environmental effects or increase the severity of previously identified significant effects related to commercial and recreational fishing.

3.5 CULTURAL AND PALEONTOLOGICAL RESOURCES

3.5.1 Cultural Resources – Historic and Paleontological

The 2000 Project Final EIR, Section 4.6.3, analyzed potential significant impacts to cultural resources associated with cable installation. Based on review of available data regarding archaeological and historic data and the results of previous seafloor surveys, the Commission did not identify any known cultural resources along the proposed cable installation routes or within the onshore cable tie-in areas or conduits and concluded that no significant impacts would occur. Because of the residual risk of encountering previously unknown cultural or paleontological resources, however, AT&T incorporated MM CR-1 into the Project design for cable installation and performed a pre-Project magnetometer survey to identify potential areas of avoidance for cable installation. During and since the E1 and S7 cable installation, no previously unknown shipwrecks or cultural resources were identified during pre-Project surveys, cable installation, or during any of the five subsequent post-burial offshore surveys in support of the cable maintenance. Thus, Project activities associated with removal of the cables from the Project area are not anticipated to result in impacts to any previously unknown resources or any new or more severe impacts to previously identified cultural resources. Furthermore, the 2000 Project Final EIR included the following two MMs, which are modified here only to apply to removal instead of installation, to avoid offshore and onshore cultural resources.

MM CRF-1(e), ROV Surveys. Survey or other means, as appropriate and as needed will be used to confirm recovery of cables will not disturb cultural resources.

MM CR-2. Should a previously unknown shipwreck of potential cultural resource value be discovered within the proposed cable corridor, the proposed cable route or installation (recovery) procedures shall be modified to avoid the potentially significant cultural resource.

Because cable recovery and cable installation activities are substantially similar, and the MMs implemented during installation would be implemented during removal, the Cable

Removal Project would not create new significant environmental effects or increase the severity of previously identified significant effects related to cultural and paleontological resources compared to the activities analyzed in the 2000 Project Final EIR.

3.5.2 Cultural Resources – Tribal

Since certification of the 2000 Project Final EIR, the State's legal and policy direction related to coordination with Native American Tribes and analysis of cultural resources has changed, most notably through Governor Brown's Executive Order (EO) B-10-11 and enactment of Assembly Bill (AB) 52 (Gatto; Stats. 2014, ch. 532). With respect to CEQA, AB 52 sets forth procedural and substantive requirements for analysis of Tribal cultural resources, as defined in Public Resources Code section 21074, and consultation with California Native American Tribes. As part of implementing EO B-10-11, which concerns coordination with Tribal governments in public decision making, the CSLC (2016) adopted a Tribal Consultation Policy (Policy) to provide guidance and consistency in its interactions with California Native American Tribes (Item 61, August 19, 2016). The Policy, which was developed in collaboration with Tribes, other State agencies and departments, and the Governor's Tribal Advisor, recognizes that Tribes have a connection to areas that may be affected by CSLC actions and "that these Tribes and their members have unique and valuable knowledge and practices for conserving and using these resources sustainably" (CSLC 2016).

Enactment of AB 52 in 2014 does not itself constitute or give rise to one of the circumstances described in State CEQA Guidelines section 15162 mandating additional environmental review. However, the Commission evaluated the potential for the Cable Removal Project to significantly impact Tribal cultural resources. In August 2017, the CSLC staff submitted a Native American Heritage Commission (NAHC) sacred lands file search requesting any known information related to Tribal cultural resource records. The NAHC's response dated August 22, 2017, indicated "Native American cultural sites are present." The NAHC also provided a Native American contact list the CSLC staff used for outreach and coordination. To ensure culturally-affiliated Tribes have the opportunity to provide information about potential Tribal cultural resources in the Cable Removal Project area and give meaningful input to the review process, the CSLC Tribal Liaison sent letters on October 3, 2017, to the Tribal representatives identified by the NAHC. Letters were sent to the following Tribes:

- Xolon-Salinan[4]
- Barbareno/Ventureno Band of Mission Indians
- Salinan Tribe of Monterey, San Luis Obispo

[4] The Xolon-Salinan Tribe previously submitted a written request to the CSLC for notification of CEQA projects pursuant to AB 52. While this Addendum is not subject to the consultation provisions of AB 52, the CSLC Tribal Liaison's letter to the Xolon-Salinan Tribal Chair included an invitation to request formal consultation.

- Northern Chumash Tribal Council
- yak tityu tityu – Northern Chumash Tribe
- Santa Ynez Band of Chumash Indians
- Coastal Band of the Chumash Nation

In response, the CSLC received one communication (October 12, 2017) from a member of the Santa Ynez Band of Chumash Indians deferring any comments to the yak tityu tityu – Northern Chumash Tribe.

Section 4.6.3 of the 2000 Project Final EIR stated that, with regard to installation activities no effects on ethnic cultural values or religious sites are known or expected. Cable recovery and cable installation activities are substantially similar, and the MMs implemented for Paleontological and Historical Resources during installation would be implemented during removal. The Tribes did not provide new information or express concerns related to removal activities. Compared to the activities analyzed in the 2000 Project Final EIR, the Cable Removal Project would not create new significant environmental effects or increase the severity of previously identified significant effects related to Tribal cultural resources.

3.6 GEOLOGY AND SOILS

Cable installation resulted in a temporary and short-term, localized impact from disturbance of seafloor sediment, especially during post-installation reburial of the cable by divers using hand jets between the conduit end and approximately 0.8 mile offshore. Since the original installation in 2001, five post-burial surveys have been completed. These surveys have shown that more than 95 and 92 percent of Cable Segments E1 and S7, respectively, are buried and that both cables have remained buried in that state since their installation.

Offshore cable removal will also cause minor disturbances to sediment in the immediate Project area; however; these impacts are anticipated to be much less, since recovery of the cable will not require jetting to pull the segments from the seafloor. In areas of rocky substrate where the cable is currently exposed, the cable will be recovered vertically and in the alignment of the current installation, thereby avoiding disturbance to adjacent sensitive resources. In addition, the MSAP (APM-1) will ensure that Project vessels will not anchor in areas of sensitive hard-bottom habitats. Furthermore, cable removal would eliminate long-term potential impacts to hard substrate due to “grooving” by the cables. Surveys or other means, as appropriate and as needed, will document post-recovery seafloor geologic conditions. No additional impacts to the offshore environment have been identified and no additional offshore mitigations are proposed.

Onshore activities are consistent with those disclosed in the 2000 Project Final EIR, and require pulling the Segment E1 and S7 cables onshore from the beach manhole located

in the Sandspit parking lot in Montaña de Oro State Park. The shore-end contractor will excavate a trench in the beach parking lot to expose the end of the bore pipe, which will temporarily displace soils. Potential impacts will be similar to those discussed in the Final EIR. No additional impacts to the onshore environment have been identified and no additional onshore mitigation measures are proposed. Compared to the activities analyzed in the 2000 Project Final EIR, the Cable Removal Project would not create new significant environmental effects or increase the severity of previously identified significant effects related to geology and soils.

3.7 GREENHOUSE GAS (GHG) EMISSIONS

Greenhouse gases (GHGs) are defined as any gas that absorbs infrared radiation in the atmosphere. GHGs include carbon dioxide (CO_2), methane (CH_4), nitrous oxide (N_2O), hydrofluorocarbons (HFCs), perfluorocarbons (PFCs), sulfur hexafluoride (SF_6), and nitrogen trifluoride (NF_3). The potential of a gas or aerosol to trap heat in the atmosphere is called global warming potential (GWP). The GWP of different GHGs varies because they absorb different amounts of heat. CO_2 is used to relate the amount of heat absorbed to the amount of the gas emissions; this is referred to as CO_2 equivalent (CO_2e). CO_2e is the amount of GHG emitted multiplied by the GWP. The GWP of CO_2, as the reference GHG, is one (1). Methane has a GWP of 25; therefore, 1 pound of methane equates to 25 pounds of CO_2e. Table 3.7-1 lists GHGs, their estimated lifetime in the atmosphere, and the GWP over a 100-year timeframe.

Table 3.7-1. Global Warming Potential (GWP) of Various Gases

Gas	Life in Atmosphere (years)	100-year GWP (average)
Carbon Dioxide (CO_2)	50 - 200	1
Methane (CH_4)	12	25
Nitrous Oxide (N_2O)	120	298
Hydrofluorocarbons (HFCs)	1.5 - 264	12 - 14,800
Sulfur hexafluoride (SF_6)	3,200	22,800

Source: 40 Code of Federal Regulations (CFR) Part 98, Subpart A, Table A-1, effective January 1, 2015 (U.S. Environmental Protection Agency 2017). The 40 CFR Part 98 approach is used to estimate GHG emissions per million British Thermal Units, assuming 99.9% combustion efficiency (Appendix D).

In California, CARB is the primary agency responsible for providing information on implementing the GHG reductions required by the State pursuant to AB 32 (CARB 2014), the Global Warming Solutions Act of 2006, and its 2016 update, Senate Bill (SB) 32. Together, these laws require CARB to develop regulations that reduce GHG emissions to 1990 levels by 2020 and to 40 percent below 1990 levels by 2030.

The SLO County APCD implements CARB's agenda within the regional Project area. In 2012, the SLO County APCD adopted the following GHG significance thresholds for residential and commercial projects: (1) Compliance with a Qualified GHG Reduction Strategy or (2) Bright-Line Threshold of 1,150 metric tons of carbon dioxide equivalent

(MTCO$_2$e) per year or (3) Efficiency Threshold of 4.9 MTCO$_2$e/Service Population (residents + employees) per year. Emissions from construction-only projects such as the Cable Removal Project (e.g., roads, pipelines, communication cables) are generally calculated over the Project life and compared to an adopted GHG Reduction Strategy or the Bright-Line Threshold only.

Although the 2000 Project Final EIR did not analyze GHG emissions (most legislation regarding GHGs was introduced in the years following the cable installation), Cable Removal Project activities would use equipment similar to that used during cable installation, including backhoes, generators, compressors, winches, hauling trucks, and marine vessels as well as vehicles used by construction workers commuting to and from the Project area. Nearshore work will be temporary and conducted during daytime hours (approximately 12 hours/day) for 2 to 3 days. Offshore work will be completed by the M/V Layla working 24 hours per day for approximately 12 days. Table 3.7-2 shows anticipated GHG emissions associated with Project implementation.

Table 3.7-2. Projected Modified Project GHG Emissions

Offshore and Onshore Sources	Source Operational Assumptions			Total Project Emissions (tons)		
	#	Hours/day	Total Days	N_2O	CH_4	CO_2
Backhoe	1	12	3	0.00001	0.00012	1.302
Cat Generator	1	24	12	0.00048	0.00238	64.350
Compressor (LP)	1	12	3	0.00000	0.00007	0.509
Outboard Motor	2	12	3	0.00005	0.00015	0.035
Vessel Engine (M/V Layla)	1	24	12	0.00204	0.00920	70.548
Winch	1	12	3	0.00001	0.00012	1.398
Total Annual Emissions (SLO County)				**0.00259**	**0.01204**	**138.142**
GHG - MTCO$_2$e Conversions				**298**	**25**	**1**
Total MTCO$_2$e / year				**126.3**		

As shown in Table 3.7-2, Project activities would emit approximately 0.003 tons of N_2O, 0.012 tons of CH_4, and 138.142 tons of CO_2. Converting N_2O, CH_4, and CO_2 to MTCO$_2$e yields a total GHG emission estimation of 126.3 MTCO$_2$e for the Project. The estimated 126.3 MTCO$_2$e is well below the APCD GHG Bright-Line threshold of 1,150 MTCO$_2$e.

With implementation of APM-5, Equipment Specifications and Emissions Reduction Plan, GHG emission impacts for the Project would be less than significant, therefore no additional mitigation is necessary. Please refer to Appendix D for the air quality calculation spreadsheets. Compared to the activities analyzed in the 2000 Project Final EIR, the Cable Removal Project would not create new significant environmental effects or increase the severity of previously identified significant effects related to GHG emissions.

3.8 HAZARDS AND HAZARDOUS MATERIALS (SYSTEM SAFETY/RISK OF UPSET)

The 2000 Project Final EIR discussed hazards and hazardous materials in the System Safety/Risk of Upset section. The Final EIR identified navigational hazards caused by increased marine traffic in local ports and harbors and Project vessels working offshore to have the potential to result in marine accidents that could cause injury or increase public risk. Additionally, offshore vessels would use diesel-fueled equipment and carry hazardous materials that have the potential to be released. However, the potential for risk or impacts associated with hazardous materials was determined to be less than significant with implementation of standard industry best management practices.

Cable Removal Project activities would occur within the same area and require similar marine vessels and equipment as the 2000 Project. No other cables would be affected (although the E1 Cable to Oregon crosses another cable [TPC-5 T1], that cable is buried well below Cable E1 and no interaction between the two cables is anticipated).

No new impacts resulting from hazardous materials are associated with the Cable Removal Project. However, minor changes have been made to the previously adopted mitigation measures to further reduce potential impacts. Since completion of the 2000 Project, additional information on the Project site was gained through the completion of five post-installation surveys of the cables. These surveys provided additional and higher quality data of the Project area seafloor that will be used in designing a Project-specific MSAP (APM-1) to address safe vessel operations during the Project. In addition to the MSAP, AT&T will provide a OSCRP (APM-2) to CSLC staff, for review and approval prior to the start of any offshore work activities, that will include preventative measures, as well as procedures to be followed in the event of a spill, including hydraulic fluids as well as fuel and other types of oil spills.

The primary work vessel (M/V Layla) will have a vessel-specific oil spill response plan and will carry on board a minimum of 400 feet of sorbent boom, five bales of sorbent pads at least 18 inches by 18 inches square and a small powered boat for rapid deployment to contain and clean up any small spill or sheen on the water surface.

As required by the USCG, all Project vessels will operate in accordance with the navigational safety requirements of Title 33 CFR Parts 154-156 (Navigational Safety). In addition, AT&T will ensure the publication of a local Notice to Mariners, describing the nature, location, and duration of cable recovery activities, at least 15 days prior to initiation of activity (APM-6). The notice will be given to the Commander, Eleventh Coast Guard District, 501 West Ocean Boulevard, Long Beach, California 90802 and will include all pertinent Project information.

The Project Modification would result in similar hazardous materials impacts as that analyzed for the 2000 Project Final EIR. No further mitigation measures are required.

Compared to the activities analyzed in the 2000 Project Final EIR, the Cable Removal Project would not create new significant environmental effects or increase the severity of previously identified significant effects related to hazards and hazardous materials.

3.9 HYDROLOGY AND WATER QUALITY

The only water quality impact identified in the 2000 Project Final EIR was water discharged during the bore pipe flushing. This activity is not required during cable recovery activities. However, as with installation activities, cable removal will result in small-scale, temporary sediment re-suspension and increased turbidity. The CSLC previously determined that "sediment re-suspension from cable installation along the seafloor will be brief and localized to the near-bottom area close to the cable alignment. Minor amplitude compared to the natural background variability in the suspended sediment loads in this coastal region" (Item 13, April 20, 2000). Cable removal operations would have similar but lesser impacts because extraction of the buried cable will generate smaller amounts of suspended sediment than generated when installing the cable by pre-installation plowing and post-installation burial of the cable by divers using hand jets between the conduit end and approximately 0.8 mile offshore.

Similar to impacts associated with the 2000 Project, impacts to water quality from the Cable Removal Project would have the potential to occur during cable removal operations if an accidental release of petroleum products, or other similar substances, were to occur. To minimize any potential impacts, AT&T will follow a Project-specific OSCRP (APM-2) during cable removal activities. Implementation of this measure will reduce potential risks to water quality to less than significant. No new impacts have been identified and no new mitigation measures are required. Compared to the activities analyzed in the 2000 Project Final EIR, the Cable Removal Project would not create new significant environmental effects or increase the severity of previously identified significant effects related to hydrology and water quality.

3.10 LAND USE

The 2000 Project Final EIR analyzed potential impacts to Land Use resources with potential impacts to Recreation. This Addendum separates the Land Use and Recreation impact analyses. Land Use impacts are discussed below. Please refer to Section 3.13, *Recreation*, for discussion of potential recreational impacts. Existing land uses within portions of the offshore cable alignment are limited primarily to offshore fishing (see Section 3.4, *Commercial and Recreational Fishing*, for further detail).

The 2000 Project required the CSLC to amend AT&T's existing Lease Nos. PRC 8278.1 (China-U.S. Segment E1) and 8154.1 (China-U.S. Segment S7) (Appendix E). In 2015, AT&T notified the CSLC of its intent to terminate these leases, which are set to expire, respectively, on April 19, 2025 and April 19, 2026, but pursuant to Section 2, Paragraph 20 of each lease, may be terminated earlier upon 2 years advanced notice. Section 2,

Paragraph 19 of each lease further requires that AT&T prepare and submit a plan for removal of cables, as appropriate, and restoration of the Lease premises. This requirement is further defined in accordance with Section 2.9.4 (Abandonment) of the 2000 Project Final EIR. In support of AT&T's modification of the Project, the following land use analysis has been prepared to address removal of cable segments E1 and S7.

In approving installation of the cables, the Commission required AT&T, upon abandonment of the cables, "to remove all conduit and inactive cables from the Mean High Tide Line to a water depth of 1,000 fathoms, as necessary so as not to interfere with commercial fishing activities" (Item 13, April 20, 2000). As shown in Figure 1-2, the on-land conduits, originally permitted by MFS Globenet, Inc., would remain in place for potential future use and would either be abandoned in place or subject to an ongoing, modified lease. As such, the Cable Removal Project would include removal offshore of approximately 66.9 miles of the E1 Cable and approximately 58.5 miles of the S7 Cable to a water depth of 1,000 fathoms.

The Project would not physically affect an established community and would not conflict with local natural resource planning and conservation on land or in the waters offshore. The cable recovery alignments are outside of any marine sanctuary boundaries. All onshore activities will be coordinated with the Department of Parks and Recreation and SLO County, and offshore activities will be coordinated with the USCG. A local Notice to Mariners will be submitted approximately 15 days prior to offshore construction to provide adequate notice to offshore recreational vessels (APM-6). Pursuant to APM-7, AT&T would also provide notice to the Morro Bay Joint Cable/Fisheries Liaison Committee, Morro Bay Harbormaster, Morro Bay and Port San Luis Commercial Fishermen's Associations, and other local fishermen who request it

Implementation of these APMs and existing mitigation measure (e.g., CRF-1) during cable removal activities will reduce potential impacts to land use within the Project region to less than significant. No new impacts to land uses have been identified and no new mitigation measures are required. Compared to the activities analyzed in the 2000 Project Final EIR, the Cable Removal Project would not create new significant environmental effects or increase the severity of previously identified significant effects related to land use.

3.11 MARINE TRANSPORTATION

The 2000 Project Final EIR indicated that "any required cable removal at end of system life would be subject to the same navigational constraints and durations [as cable installation]. Thus, marine transportation impacts during repair [or removal] events would be short term and less than significant." However, 2000 Project installation activities were anticipated to take approximately 33 to 37 active working days to complete. The modified Project cable removal operations are expected to take

significantly less time, estimated at approximately 12 days offshore, albeit using similar vessels and traveling within the same offshore transportation routes.

Recreational boating in the vicinity of the cable route and cable landing area would not be significantly affected by the cable recovery activities. In accordance with Title 47 U.S. Code, Chapter 2 (Submarine Cables, §§ 24 and 25), vessels unrelated to Project work activities will be required to maintain a minimum safe distance of 1 nautical mile from cable recovery operations to avoid navigational delays or unsafe situations. The Cable Removal Project would result in similar, less-than-significant marine transportation impacts as addressed in the 2000 Project Final EIR. Thus, no new impacts have been identified and no new mitigation measures are required. Compared to the activities analyzed in the 2000 Project Final EIR, the Cable Removal Project would not create new significant environmental effects or increase the severity of previously identified significant effects related to marine transportation.

3.12 NOISE

The 2000 Project Final EIR analyzed potential impacts to the existing noise environment with potential impacts to Aesthetic Resources caused by Project construction, both of which were limited to "short-term relatively minor changes in the physical environment during cable installation" that could affect the visual and auditory perceptions of visitors to Montaña de Oro State Park or adjacent residents. For the purposes of this analysis, Aesthetics and Noise Sections are separated. A discussion of noise is provided below. Please refer to Section 3.1 for detail on potential impacts to aesthetic resources.

The Project does not introduce any new or long-term sources of noise to the onshore or offshore environment. 2000 Project activities included the use of offshore vessels and standard onshore construction Project equipment including generators, compressors, and winches. Impacts to the existing noise environment were determined to be less than significant.

The Cable Removal Project is expected to result in similar noise impacts as those associated with the 2000 Project. Similar offshore marine vessels would be used for offshore cable removal operations; however, cable recovery would be accomplished in substantially less time than installation, primarily because unearthing of the cable within the buried segments is not required to accomplish removal. Similar to the 2000 Project, onshore equipment would include typical diesel-fueled backhoes, generators, compressors, and winches.

Originally, noise levels were analyzed to be approximately 90 decibels at 10 feet distance. According to the San Luis Obispo County General Plan Noise Element (2015), residential areas have a maximum noise exposure of 70 decibels from 7 a.m.to 10 p.m. and 65 decibels from 10 p.m. to 7 a.m. Because noise levels decrease approximately 6 decibels with each doubling of the distance from the noise source, noise produced from

construction equipment at the Sandpit parking lot would remain at or below the 70 decibels threshold instituted for San Luis Obispo County for residential areas (San Luis Obispo County 1992) within approximately 200 feet of Project activities. Project activities would be short-term, and would not occur within 0.5 mile of any residential areas.

Impacts associated with offshore and onshore Cable Removal Project activities would result in similar noise impacts as that analyzed for the 2000 Project Final EIR. No new impacts have been identified and no new mitigation measures are required. Compared to the activities analyzed in the 2000 Project Final EIR, the Cable Removal Project would not create new significant environmental effects or increase the severity of previously identified significant effects related to noise.

3.13 RECREATION

The 2000 Project Final EIR analyzed potential impacts to Recreation with potential impacts to Land Use. For the purposes of this analysis, the Land Use and Recreation sections are separated. A discussion of Recreation is provided below. Please refer to Section 3.10 for potential impacts related to Land Use.

Offshore recreational activities within Montaña de Oro State Park consist primarily of kayaking, fishing, surfing and boating (see also Section 3.4 for detail regarding commercial and recreational fishing resources in the area). Onshore recreational resources are limited to the Sandspit parking lot, which is a public parking lot located approximately 1 mile off of Pecho Valley Road, along Sandspit Road, in Montaña de Oro State Park. Onshore recreational resources are limited to the Sandspit parking lot, which is a public parking lot located approximately 1 mile off of Pecho Valley Road, along Sandspit Road, in Montaña de Oro State Park. The parking lot contains 50 parking spaces, tables, and restrooms, and is at the head of a trail to Sandspit Beach.

Cable recovery activities at the Sandspit parking lot are expected to occupy 25 of the 50 parking spaces in the parking lot for 2 to 3 days. However, coordination with the Department of Parks and Recreation, the County, and CSLC Executive Officer for the scheduling and location of Project activities at the onshore location would reduce potential short-term impacts to the greatest extent feasible. These impacts are similar to those addressed in the 2000 Project Final EIR, but for a shorter duration. 2000 Project activities anticipated use of the Sandspit parking lot for approximately 1 to 2 weeks. Cable Removal Project would require significantly less time at 2 to 3 days. Thus, no new impacts have been identified and no new mitigation measures are required. Compared to the activities analyzed in the 2000 Project Final EIR, the Cable Removal Project would not create new significant environmental effects or increase the severity of previously identified significant effects related to recreation.

3.14 SOCIOECONOMICS

According to the 2000 Project Final EIR, the socioeconomic impacts of the cable installation derived from its effects on commercial fishing. Socioeconomic impacts were considered to be potentially significant for both the short-term (during installation) and long-term (potential fishing restrictions lasting throughout the life of the E1 and S7 cables). The CSLC required AT&T to implement several measures to mitigate impacts on commercial and recreational fishing to a less than significant level.

Cable removal may also temporarily impede fishing activities in the immediate area during the short duration of the operations; however, as discussed in Section 3.4, *Commercial and Recreational Fishing*, removal of the cables would eliminate the long-term risk of snagging of commercial fishing gear on the cables. Submission of the modified Project Execution Plan, and the resulting removal of the cables, are consistent with the commercial and recreational fishing EIR MM CRF-1 which requires AT&T to submit a plan for cable removal as necessary so as not to interfere with commercial fishing activities in areas where such cables were previously installed. No new impacts have been identified and no new mitigation measures are required. Compared to the activities analyzed in the 2000 Project Final EIR, the Cable Removal Project would not create new significant environmental effects or increase the severity of previously identified significant effects related to socioeconomics.

4.0 DETERMINATION AND ADDENDUM CONCLUSION

As detailed in Section 3.0 above, this Addendum to the 2000 Project Final Environmental Impact Report (EIR) certified by the California State Lands Commission (Commission or CSLC) as lead agency under the California Environmental Quality Act (CEQA) in April 2000, supports the conclusion that the changes to the 2000 Project do not result in any new significant environmental effects or a substantial increase in the severity of previously identified significant effects. No new information regarding adverse impacts has become available and no substantial changes to the circumstances under which the 2000 Project is being undertaken have occurred since certification of the Final EIR. No substantial changes are required for the Cable Removal Project compared to that analyzed in the 2000 Project Final EIR. Impacts associated with removal of the cables would result in beneficial impacts to commercial and recreational fishing and would by extension result in a net socioeconomic benefit to the region's fishing industry. There are no new mitigation measures required and no new alternatives are available that would substantially reduce the environmental effects beyond those previously described in the 2000 Project Final EIR.

The Project is consistent with State CEQA Guidelines section 15164 in that only minor changes have been made to the Project, and none of the conditions described in State CEQA Guidelines section 15162 has occurred. Therefore, no subsequent or supplemental document is required.

5.0 OTHER COMMISSION CONSIDERATIONS

In addition to the environmental review required pursuant to the California Environmental Quality Act (CEQA), a public agency may consider other information and policies in its decision-making process. This section presents information relevant to the California State Lands Commission's (Commission's or CSLC's) consideration of the AT&T Cable Removal Project. The considerations included below address:

- Climate Change and Sea-Level Rise
- Environmental Justice

Other considerations may be addressed in the staff report presented at the time of the Commission's consideration of the Cable Removal Project.

5.1 CLIMATE CHANGE AND SEA LEVEL RISE

Climate change impacts, including sea-level rise, are now recognized as known geophysical components of California coastal and ocean sites. Climate change and sea-level rise accelerate and exacerbate natural coastal processes, such as intensity and frequency of storms, erosion and sediment transport, and currents, wave action, and ocean chemistry. Sea-level rise is driven by the melting of polar ice caps and land ice, as well as thermal expansion of sea water. Accelerating rates of sea-level rise are attributed to increasing global temperatures due to climate change. Estimates of projected sea-level rise vary regionally and are a function of different greenhouse gas emissions scenarios, rates of ice melt, and local vertical land movement. Compared to year 2000 levels, the southern California region could see up to 1 foot of sea-level rise by the year 2030, 2 feet by 2050, and possibly over 5 feet by 2100 (National Research Council 2012). The range in potential sea-level rise indicates the complexity and uncertainty of projecting these future changes, particularly in the second half of the century, that depend on the rate and extent of ice melt. The state of California is coordinating research efforts to understand more about the individual influences of certain contributing factors, such as ice melt, and will issue findings and new planning guidance related to sea-level rise by 2018.

Along with higher sea levels, higher intensity and more frequent winter storms due to climate change will further impact coastal areas. The combination of these conditions will likely result in increased wave run up, storm surge, and flooding in coastal and near coastal areas. In rivers and tidally-influenced waterways, more frequent and powerful storms can result in increased flooding conditions and damage from storm created debris. Climate change and sea-level rise will also affect coastal and riverine areas by changing erosion and sedimentation rates. Beaches, coastal landscapes, and near-coastal riverine areas exposed to increased wave force, run up, and total water levels could potentially erode more quickly than before. However, rivers and creeks are also predicted to experience flashier sedimentation pulse events from strong winter storms,

punctuated by periods of drought. Therefore, depending on precipitation patterns, sediment deposition and accretion may accelerate along some shorelines and coasts.

Weather systems and extreme storms can also cause dangerous coastal hazards to surface on shore. The CSLC, when funding is available, implements a program to remove coastal hazards along California's coast (see www.slc.ca.gov/Programs/CoastalHazards.html). Examples of hazards are remnants of coastal structures, piers, oil wells and pilings, and deteriorated electric cables and old pipelines. Many coastal hazards are located on Public Trust lands set aside for commerce, navigation, fishing, and recreation, and can impede coastal uses as well as threaten public health and safety.

Governor Brown's Executive Order B-30-15 instructed all State agencies to take climate change into account in their planning and investment decisions and to give priority to actions that build climate preparedness. The preceding discussion of climate change and sea-level rise provides a local/regional overview and context that will facilitate the Commission's consideration of the Cable Removal Project. The Project includes removal of onshore cable segments at an existing manhole/conduit located in a parking lot at Montaña de Oro State Park as well as removal of cable segments from nearshore out to 1,000 fathom water depth. The only remaining offshore infrastructure would be the nearshore conduits for possible future reuse or abandonment. These conduits were installed by horizontal directional drilling beneath the seafloor extending approximately 2,300 feet offshore. Because of the depth of burial (approximately 85 feet below Mean Lower Low Water; see Appendix B), sea-level rise as a function of global climate change will not affect these existing conduits.

5.2 ENVIRONMENTAL JUSTICE

In keeping with its commitment to environmental sustainability and access to all, California was one of the first states to codify the concept of environmental justice in statute. Environmental justice is defined by state law as "the fair treatment of people of all races, cultures, and incomes with respect to the development, adoption, implementation, and enforcement of environmental laws, regulations, and policies." This definition is consistent with the Public Trust Doctrine principle that the management of trust lands is for the benefit of all people. The CSLC adopted an environmental justice policy in October 2002 to ensure that environmental justice is an essential consideration in the agency's processes, decisions, and programs. Through its policy, CSLC reaffirms its commitment to an informed and open process in which all people are treated equitably and with dignity, and in which its decisions are tempered by environmental justice considerations.

Beyond the fair treatment principles described in statute, environmental justice leaders work to include in the decision-making process those individuals disproportionately impacted by project effects. The goal is that through equal access to the decision-

making process, everyone has equal protection from environmental and health hazards and can live, learn, play, and work in a healthy environment.

In 2016, SB 1000 (Leyva) was enacted to require local governments with disadvantaged communities, as defined in statute, to incorporate environmental justice into their general plans when updating two or more general plan elements (sections). The Governor's Office of Planning and Research, the lead state agency on planning issues, is developing guidance for local jurisdictions to incorporate environmental justice into their general plans and is working with state agencies, local governments, and many partners to create a technical assistance document. The U.S. Council of Environmental Quality's (CEQ) Environmental Justice Guidance defines "minorities" as individuals who are members of the following population groups: American Indian or Alaskan Native, Asian or Pacific Islander, Black not of Hispanic origin, or Hispanic (CEQ 1997). Total minority population is calculated by subtracting the white alone, not Hispanic or Latino population, from the total population. According to the CEQ Environmental Justice Guidelines, minority populations should be identified if:

- A minority population percentage exceeds 50 percent of the population of the affected area.
- The minority population percentage of the affected area is meaningfully greater than the minority population percentage in the general population or other appropriate unit of geographic analysis (for example, a governing body's jurisdiction, neighborhood census tract, or other similar unit).

In addition, the CEQ Environmental Justice Guidance defines "low-income populations" as populations with mean annual incomes below the annual statistical poverty level (CEQ 1997). The CEQ does not provide a discrete threshold for determining when a low-income population should be identified for environmental justice; however, for this analysis, an environmental justice population is identified if the low-income percentage of a census tract is equal to or greater than those of San Luis Obispo County.

From a regional standpoint, the Cable Removal Project is within an area with average income levels compared to San Luis Obispo County and the State of California (see Table 5-1). Morro Bay is supported by numerous retail trade; professional, scientific, and management, and administrative and waste management services; educational services, and health care and social assistance; and arts, entertainment, and recreation, and accommodation and food services (U.S. Census Bureau 2017). By race, persons who identified as white are the largest racial group in Morro Bay (see Table 5-1). Asian comprises the largest racial minority group (the U.S. Census Bureau classifies Hispanic as an origin, not a race). Those who identify as Hispanic can be categorized under any of the classification groups designated by the U.S. Census Bureau, including "other," in addition to Hispanic. Hispanic comprises 14.9 percent of the population of Morro Bay, and 20.8 percent of San Luis Obispo County.

Table 5-1 Environmental Justice Statistics

Subject		California	San Luis Obispo County	City of Morro Bay	City of San Luis Obispo
Income and Population					
Total Population		37,253,956	269,637	10,234	45,119
Median household income		$61,818	$60, 691	$51,338	$46,058
Percent below the Poverty level		16.3	14.8	12.9	33.4
Employment by Industry (percentage)					
Agriculture, forestry, fishing and hunting, and mining		2.4	3.7	1.2	0.7
Construction		6.0	6.8	4.9	3.5
Manufacturing		9.8	6.8	4.6	7.1
Wholesale trade		3.1	2.2	1.9	1.9
Retail trade		11.1	11.9	11.2	14.6
Transportation and warehousing, and utilities		4.7	5.1	5.1	3.1
Information		2.9	1.6	3.7	2.3
Finance and insurance, and real estate and rental and leasing		6.2	4.7	4.0	3.9
Professional, scientific, and management, and administrative and waste management services		12.9	10.6	11.7	10.8
Educational services, and health care and social assistance		21.0	23.9	27.2	26.8
Arts, entertainment, and recreation, and accommodation and food services		10.2	12.0	16.2	16.1
Other services, except public administration		5.4	4.9	5.1	5.3
Public administration		4.5	5.7	3.3	4.0
Race (percentage)					
Not Hispanic or Latino	White	40.1	71.1	79.4	75.8
	Black	5.8	1.9	0.4	1.0
	American Indian	0.4	0.5	0.6	0.3
	Asian	12.8	3.0	2.5	5.1
	Other	3.1	2.7	2.3	3.1
Hispanic or Latino		37.6	20.8	14.9	14.7

Source: U.S. Census Bureau 2017
Note: Percentages may not add up to 100 due to rounding.

In Morro Bay and San Luis Obispo County, respectively, 12.9 and 14.8 percent of individuals have income levels below the poverty level. Therefore, Cable Removal Project activities in Morro Bay are not expected to disproportionately affect minority or low-income communities. Since the percentage of these populations in the nearest communities are not disproportionately higher than in the surrounding area, Project impacts would not disproportionately affect minority or low-income populations. In addition, the distance from the Project site to residential communities, and small-scale and short-term Project duration, ensure that environmental justice impacts to all nearby residential communities would be minor, regardless of their socioeconomic makeup.

6.0 PREPARATION SOURCES AND REFERENCES

6.1 ADDENDUM PREPARERS

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APPENDIX A

ORIGINAL 2000 PROJECT FINAL EIR

Finalizing Addendum to the Draft Environmental Impact Report (EIR) for the AT&T China–U.S. Cable Network, Segments E1 and S7 Project (SCH No. 99051063)

California State Lands Commission (2000b)
Prepared with the assistance of Science Applications International Corporation (SAIC)

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APPENDIX B

ORIGINAL PROJECT AS-BUILTS

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APPENDIX C

2015 ROV SURVEYS

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APPENDIX D

AIR QUALITY AND GREENHOUSE GAS SPREADSHEETS

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APPENDIX E

LEASE NUMBERS PRC 8154.1 AND PRC 8278.1

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